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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

OKECHUKWU MBAMA, individually
and on behalf of all others similarly
situated,

Plaintiff,

vs.

TARGET CORPORATION, a Minnesota
Corporation, and Does 1-25, inclusive,

Defendant.

No. C-07-3014-JL

**DEFENDANT TARGET
CORPORATION'S SUPPLEMENTED
NOTICE OF PENDENCY OF OTHER
ACTION OR PROCEEDING**

To the Clerk of Court, plaintiff Okechukwu Mbama, and plaintiff's attorneys of record:

Pursuant to this Court's Civil Local Rule 3-13, defendant Target Corporation hereby supplements its notice that the following cases are related to this case as follows (additional material in underscore):

- *Cheryl Kier, Plaintiff, v. Target Corporation, a Minnesota Corporation, and Does 1-25 inclusive, Defendant*, U.S.D.C., C.D. Cal., No. CV 07-02739 (Ssx), originally filed on December 29, 2006, in the United States District Court in and for the Northern District as case number C-06-07957-MHP.
- *Renee Cesar Vilches Mora, on behalf of himself and all others similarly situated, Plaintiffs, v. Target Corporation, a Minnesota Corporation, and Does 1 through 125, Inclusive, Defendants*, U.S.D.C., S.D. Cal., No. 07 CV 0719 JM (filed on April 19, 2007).

These cases are related to this case in that they are based on the same or similar claims and involve substantially the same facts and the same questions of law.

Kier v. Target Corp. was pending before the Honorable Marilyn Hall Patel of this Court prior to her April 2, 2007, order to transfer *Kier* to the Central District of California (*see Kier*, U.S.D.C., N.D. Cal., No. C-06-07957-MHP, Docket No. 37). This action, *Mbama v. Target Corp.*, is brought by the same counsel who brought *Kier*, and is their attempt to end-run Judge Patel's transfer order. Indeed, prior to Judge Patel's transfer order, counsel sought—unsuccessfully—to add Okechukwu Mbama, the plaintiff in this action, to the *Kier v. Target Corp.* case as a second plaintiff. Target therefore believes that this action should be reassigned to Judge Patel for further disposition.

Dated: August 8, 2007.

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By: /s/ Jeffrey D. Wohl

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